

### **REMARKS**

In the Office Action, the Examiner rejected Claims 1-19, which were all of the then pending claims, under 35 U.S.C. 103 as being unpatentable over U.S. Patent 6,615,166 (Guheen, et al.) in view of U.S. Patent application publication no. 2005/055357 (Campbell), U.S. Patent 5,930,806 (Taira, et al.) and U.S. patent application publication no. 2004/0194055 (Galloway, et al.).

Independent Claims 1, 7 and 13 are being amended to better define the subject matters of these claims. Claim 19 is being cancelled because the limitations thereof are being added to Claim 1. New Claim 20, which is dependent from Claim 1, is being added to describe features of an embodiment of the invention. A minor informality in Claim 18 is being corrected – specifically, in the second line of the fourth subparagraph, the spelling of “manager” is being corrected.

For the reasons discussed below, Claims 1-18 and 20 patentably distinguish over the prior art and are allowable. The Examiner is thus asked to reconsider and to withdraw the rejection of Claims 1-18 under 35 U.S.C. 103 and to allow these claims and new Claim 20.

Generally, Claims 1-18 and 20 patentably distinguish over the prior art and are allowable because the prior art does not disclose or render obvious the use of the plurality of databases, as described in independent Claims 1, 7 and 13 to manage and effect an enterprise-wide network migration from one network to another network. More specifically, the prior art does not disclose or render obvious the use of the documentation and rules database to distribute update information to all instances of the migration manager database, as described in Claims 1, 7 and 13.

As discussed in Applicants' previous Amendment, the present invention relates to an integrated set of tools and processes to manage an enterprise-wide technology migration. Many corporations and other enterprises have very extensive information technology or telecommunications systems or networks. From time to time, it is necessary or desirable to make extensive or fundamental changes in or to these networks or systems.

These migrations can be very difficult, complicated and expensive to manage. This is because of the large amount of equipment involved, the disparate nature of the equipment, and the complex relationships between the different pieces or types of equipment.

The present invention effectively addresses the challenge of managing an enterprise-wide network migration. Generally, this is done by providing a configurable, integrated and end-to-end set of processes and corresponding electronic toolsuite to manage effectively large-scale enterprise wide information technology-related or telecommunications related migrations.

More specifically, Applicants' invention, in one embodiment, provides a method of managing and effecting an enterprise-wide network migration from one type of network to another type of network. This method comprises the steps of creating instances of databases for an enterprise-wide migration from one type of network to another type of network. These databases include a migration manager database that includes a migration manager database and a billing and reporting database. The migration manager database includes one entry for each client, machine, and device being affected by the migration.

The method comprises the further steps of gathering information on the organization, location, hardware, and software affected by said migration into the migration manager database; and building an inventory of the affected hardware and software using an inventory tracking tool or an inventory mailer.

This method comprises the further steps of determining hardware that needs to be ordered for the migration using the migration manager database; and ordering hardware and software for the migration based on said planning and said inventory, using an inventory tool. The labor, hardware, and software as installed in the new network is tracked and billed, using the billing and reporting database. In addition, in this embodiment, agents for the above-mentioned creating, gathering, building and tracking are enabled using an agent control facility. Also, in one embodiment, the invention further includes an instance manager database and a documentation and rules database. The instance manager database contains one entry for each instance of the migration manager. The documentation and rules database contains documentation and configurable rules common to all instances of the migration manager database, and this documentation and rules database is used to distribute updates of information of the information contained in the database to all instances of the migration manager database.

As indicated above, the prior art does not disclose or render obvious the way the above-described databases are used in combination to effect an enterprise wide network migration, and in particular, the prior art does not disclose or render obvious the way the documentation and rules database is used, as described above, to distribute updates of information to all instances of the migration manager database.

For instance, Guheen, et al. discloses a procedure for conveying information regarding a web architecture framework and for demonstrating priority among components of the architecture. In this procedure, a plurality of components, required for implementation of a predetermined technology, are provided. Then, a priority listing of the components is compiled such that the relative position of the components on the priority listing corresponds to a temporal priority among the components. The existing network framework and the components are

pictorially represented, and then components of the existing network framework are coded to indicate priority among the components. The components can then be installed in order of their coded priority.

Guheen, et al. is principally directed to displaying information in a concise and well-organized manner, and in particular, for generating such a display of a web architecture framework. Once the display is formed, the system components can be selected according to a defined priority (See column 1, lines 58-67; and column 7, lines 1-10).

It is important to emphasize that there is a very important general difference between the present invention and the method and system disclosed in Guheen, et al. - Guheen, et al. is directed to implementing an existing network framework, while the present invention is directed to migrating from one network to another network.

An enterprise wide network migration can be more complex than simply designing or implementing a new network from scratch because, in the case of a migration, existing equipment has to be taken into account. The implementation of the network migration needs to consider whether the old equipment and software can be used in the new network, and if so, how that equipment and software can be used in the new network. The present invention effectively does this by using a series of databases.

In particular, one database, referred to as the migration manager database, keeps track of each client, machine, and device being affected by the migration. A second database, referred to as a billing and reporting database, is used to keep track of labor, hardware and software as installed in the new network. A third database – the documentation and rules database – is used to contain documentation and configurable rules common to all instances of the migration

manager database and to distribute updates in this information to all instances of that migration manager database.

Taira, et al. discloses a migration system to migrate data from a network data model, where records are interrelated by pointers, to a relational data model. The system described in Taira, et al. comprises a record migration unit, a primary key addition unit, a relation key addition unit, and a set sequence key addition unit. The record migration unit creates target records for the relational data model, which are arranged in the same way that source records are originally arranged in the network data model.

While Taira, et al, unlike Guheen, et al, discloses a migration system, the system described in Taira, et al. is used only to migrate data. In contrast, the present invention is used to migrate a complete network, including hardware and software. As will be appreciated, the present invention thus addresses, successfully, a more complex issue.

The above-discussed use of the databases is also not disclosed in or rendered obvious in view of either Campbell or Galloway, et al, which were both cited for the first time in the last Office Action.

Galloway, et al. is directed to the migration of computer based applications from source platforms to target platforms. Applicants' invention effectively addresses a substantially more complex situation – a migration of equipment during a migration from one network to another network.

Campbell describes a procedure for preserving data during a system migration. This reference was specifically cited for disclosing a migration manager database of the type described in Claim 1, and an instance manager database and a documentation and rules database of the type described in previous Claim 19.

Significantly, Campbell is directed to a relatively limited purpose – preserving data during a system migration. The present invention, as indicated above, addresses a much more complex matter – actually effecting a migration of equipment during a migration from one network to another network. In view of this, Campbell does not disclose, and does not render obvious, the way the documentation and rules database is used in the present invention – that is, to distribute updated of the information contained in the database to all instances of the migration manager database.

The independent Claims 1, 7 and 13 are being amended to describe positively this difference between the instant invention and the prior art. Specifically, each of these claims is being amended to include the limitation that the documentation and rules database is used to distribute updated of the information contained in the database to all instances of the migration manager database.

The use of this database in this way is of utility because it may be used to achieve effectively a migration from one network to another, involving a large amount of complex and disparate equipment.

The other reference of record have been reviewed, and these other references, whether considered individually or in combination, also do not disclose or render obvious the use of the databases, as described in independent Claims 1, 7 and 13, to help manage and effect an enterprise-wide network migration from one network to another network.

In view of the above-discussed differences between Claims 1, 7 and 13 and the prior art, and because of the advantages associated with those differences, Claims 1, 7 and 13 patentably distinguish over the prior art and are allowable. Claims 2-6, 18 and 20 are dependent from Claim 1 and are allowable therewith. Similarly, Claims 8-12 are dependent from Claim 7 and

are allowable therewith; and claims 14-17 are dependent from, and are allowable with, Claim 7. The Examiner is, thus, respectfully asked to reconsider and to withdraw the rejection of Claims 1-18 under 35 U.S.C. 103, and to allow claims 1-18 and 20.

Every effort has been made to place this application in condition for allowance, a notice of which is requested. If the Examiner believes that a telephone conference with Applicants' Attorneys would be advantageous to the disposition of this case, the Examiner is asked to telephone the undersigned.

Respectfully Submitted,

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